

Exhibit 1
Declaration of James A. Bowman

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SPN/HDM/RCH
F. #2018R01309

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 17, 2021

By E-mail

Matthew Herrington, Esq.
Phara Guberman, Esq.
Paul Hastings LLP
2050 M Street NW
Washington, D.C. 20036

Re: United States v. Thomas J. Barrack, et al.
Criminal Docket No. 21-371 (BMC)

Dear Counsel:

We write in response to your letters dated August 10, 2021 and July 27, 2021 in which you define the prosecution team in this matter to include: (i) the U.S. Department of Justice, including but not limited to the National Security Division or its Counterintelligence and Export Control Section; (ii) the Special Counsel's Office; (iii) the Federal Bureau of Investigation; (iv) the U.S. Attorney's Office for the Eastern District of New York; (v) the U.S. Attorney's Office for the Southern District of New York; (vi) the U.S. Attorney's Office for the Central District of California; (vii) any other relevant law enforcement or intelligence agency, domestic or foreign; and (viii) any individual or entity with which there is a cooperation agreement with the government.¹ As set forth below, your definition of the "prosecution team" is inconsistent with applicable law.

The Second Circuit has held that a prosecutor's constructive knowledge only extends to those individuals who are part of the "prosecution team." United States v. Gil, 297 F.3d 93, 106 (2d Cir. 2002). "Whether someone is part of the prosecution team depends on the level of interaction between the prosecutor and the agency or individual." United States v. Meregildo, 920 F. Supp. 2d 434, 440-41 (S.D.N.Y. 2013) (internal citations and quotation marks

¹ In your letter dated August 10, 2021, you reference the fact that the government has produced records from the U.S. Department of State and U.S. Customs and Border Protection pursuant to Federal Rule of Criminal Procedure 16. It is unclear from your letter whether you now take the position that these entities are also members of the prosecution team. For the avoidance of doubt, we do not consider either of these two entities to be members of the prosecution team.

omitted). At its core, members of the team perform investigative duties and make strategic decisions about the prosecution of the case. *See, e.g., United States v. Finnerty*, 411 F. Supp. 2d 428, 432 (S.D.N.Y. 2006) (defining the government as encompassing “government agenc[ies] so closely aligned with the prosecution [] as to be considered part of the prosecution team”); *United States v. Volpe*, 42 F.Supp.2d 204, 221 (E.D.N.Y. 1999) (“Courts have construed the term ‘government’ in this rule narrowly to mean the prosecutors in the particular case or the governmental agencies jointly involved in the prosecution of the defendant....”); *United States v. Upton*, 856 F. Supp. 727, 749 (E.D.N.Y. 1994) (“The key to the analysis, therefore, is the level of involvement between the United States Attorney's Office and the other agencies. The inquiry is the extent to which there was a joint investigation with another agency.” (internal quotation marks, alterations, ellipses omitted)). Interacting with the prosecution team, without more, does not make someone a team member. Instead, under the totality of the circumstances, the more involved individuals are with the prosecutor, the more likely they are team members. *See United States v. Stewart*, 323 F.Supp.2d 606, 616–18 (S.D.N.Y.2004) (declining to impute knowledge of a forensic expert from the Secret Service lab who provided trial support for the prosecution and testified as an expert).

Here, your proposed definition of the prosecution team is unsupported by existing law and is so expansive as to render the term effectively meaningless. *See Finnerty*, 411 F. Supp. 2d at 433 n. 3 (holding that the “imposition of a duty on the prosecution to inquire of different offices of the government would be to adopt a ‘monolithic view of government’ that would ‘condemn the prosecution of criminal cases to a state of paralysis.’”) (quoting *United States v. Avellino*, 136 F.3d 249, 255 (2d Cir. 1998)). As you are undoubtedly aware, in *United States v. Connolly, et al.*, No. 16 CR 370 (S.D.N.Y.), Chief Judge McMahon in the Southern District of New York addressed two defendants’ discovery requests that were premised on a similarly overbroad definition of “prosecution team.” In *Connolly*, the defendants argued that various domestic and foreign governmental agencies constituted members of the prosecution team. *See* Dkt. No. 53. Chief Judge McMahon disagreed, and denied the defendants’ motion to compel the government to search the files of various domestic and foreign governmental agencies. *See* Dkt. No. 61. The defense’s position here is similarly overbroad and misguided. *See Finnerty*, 411 F. Supp. 2d at 433 (“The mere fact that the Government may have requested and received documents from [another agency] in the course of its investigation does not convert the investigation into a joint one.”); *Meregildo*, 920 F. Supp. 2d at 440-41 (“[I]nvestigating case agents are part of the prosecution team but agents of a separate organization or sovereign who are uninvolved in the investigation are not.”).

In this case, the members of the prosecution team include: (i) Assistant U.S. Attorneys from the U.S. Attorney’s Office for the Eastern District of New York; (ii) Trial Attorneys from the U.S. Department of Justice’s Counterintelligence and Export Control Section; and (iii) agents and analysts from the Federal Bureau of Investigations’ New York Field Office. As you are aware, the Special Counsel’s Office was permanently closed in approximately May 2019, more than two years before the instant indictment. Prior to its closure, the Special Counsel’s Office provided the members of the prosecution team with materials related to the instant matter, which are now in the possession of the prosecution team. The prosecution team has reviewed and will continue to review those materials to ensure that it meets its disclosure obligations under Federal Rule of Criminal Procedure 16, 18 U.S.C. § 3500, *Brady*

v. Maryland, 373 U.S. 83 (1963), and Giglio v. United States, 405 U.S. 150 (1972). Similarly, the prosecution team will fulfill its disclosure obligations with respect to materials it has received or will receive from other governmental agencies.²

In its letter dated August 3, 2021, the government offered to confer regarding any disagreements related to the scope of its obligations under Federal Rule of Criminal Procedure 16, 18 U.S.C. § 3500, Brady, and Giglio. We remain available to do so regarding this and any other matter upon which the parties disagree.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
Ryan C. Harris
Samuel P. Nitze
Hiral D. Mehta
Assistant U.S. Attorneys
(718) 254-7000

² As noted above, the mere fact that a governmental agency, whether foreign or domestic, has provided or will provide materials that may be discoverable does not make such an agency a member of the prosecution team. As you are aware, the government has already provided you with materials obtained from the U.S. Department of State, U.S. Customs and Border Protection, and the Special Counsel's Office.

Exhibit 2
Declaration of James A. Bowman

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH
F. #2018R01309

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 27, 2021

By Email

Matthew Herrington, Esq.
Paul Hastings LLP
2050 M Street NW
Washington, D.C. 20036

Re: United States v. Thomas Barrack, et al.
Criminal Docket No. 21-0371 (BMC)

Dear Mr. Herrington:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. These materials are being produced to you prior to the entry of any protective order by the Court pursuant to Federal Rule of Criminal Procedure 16(d)(1), based on your representation that, until the entry of such an order, you would treat the material as "Attorneys' Eyes Only" and would not further distribute the material. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

A. Statements of the Defendant

- Report of interview of the defendant on or about December 12, 2017, which is Bates-numbered BARRACK-000000001 to BARRACK-000000019;
- Report of interview of the defendant on or about June 20, 2019, which is Bates-numbered BARRACK-000000020 to BARRACK-000000042; and
- Handwritten notes of interview of the defendant on or about June 20, 2019, which are Bates-numbered BARRACK-000000043 to BARRACK-000000098.

B. Expert Witnesses

The government will comply with Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 and notify you in a timely fashion of any expert that the government intends to

call at trial and provide you with a summary of the expert's opinion. The identity, qualifications, and bases for the conclusions of each expert will be provided to you when they become available.

C. Brady Material

The government is not aware of any exculpatory material regarding the defendant. The government understands and will comply with its continuing obligation to produce exculpatory material as defined by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny.

Before trial, the government will furnish materials discoverable pursuant to Title 18, United States Code, Section 3500, as well as impeachment materials. See Giglio v. United States, 405 U.S. 150 (1972).

D. Other Crimes, Wrongs or Acts

The government will provide the defendant with reasonable notice in advance of trial if it intends to offer any material under Fed. R. Evid. 404(b).

II. The Defendant's Required Disclosures

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, the government requests that the defendant have copies of those statements available for production to the government no later than the commencement of trial.

The government also requests that the defendant disclose a written summary of testimony that the defendant intends to use as evidence at trial under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for the opinions, and the qualification of the witnesses.

Pursuant to Fed. R. Crim. P. 12.3, the government hereby demands written notice of the defendant's intention, if any, to claim a defense of actual or believed exercise of public authority, and also demands the names and addresses of the witnesses upon whom the defendant intends to rely in establishing the defense identified in any such notice.

III. Emails Sent and Received by Defendants Incarcerated at a Bureau of Prisons Facility

The government may request that the Bureau of Prisons (“BOP”) produce to the government emails sent and received by the defendant during his period of incarceration at a BOP facility (collectively, “BOP email communications”). While it is the government's position that BOP email communications, including those between the defendant and his or her attorneys and other legal assistants and paralegals on their staff, are not privileged communications, in most instances, the government will request that the BOP exclude from any production communications between the defendant and his or her attorneys and other legal assistants and paralegals on their staff, if you provide the full email addresses for such attorneys, legal assistants and paralegals by September 6, 2021. To enable this process, the government requests that you send an email to the undersigned Assistant U.S. Attorneys with the list of email addresses in the body of the email. If you subsequently wish to provide an email address for an additional attorney, legal assistant or paralegal or change any of the previously-provided email addresses, you should send an email with the complete list of email addresses, including email addresses that remain unchanged, in the body of the email.

IV. Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/ Ryan C. Harris
Ryan C. Harris
Nathan D. Reilly
Samuel P. Nitze
Hiral D. Mehta
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

Exhibit 3
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Filed Under Seal

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Exhibit 15
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Filed Under Seal

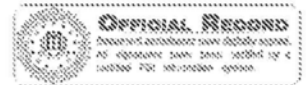
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Exhibit 16
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Filed Under Seal

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM

Exhibit 17
Declaration of James A. Bowman

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM



FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/26/2018

Stephen K. Bannon was interviewed at the Special Counsel's Office, located at Patriots Plaza I, 395 E Street SW, Washington, DC. Bannon was accompanied by his attorneys [REDACTED] Present for the interview were Special Agent (SA) [REDACTED] SA [REDACTED]

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[REDACTED] Intelligence Analyst [REDACTED] Senior Counselor to the Special Counsel James L. Quarles, Counselor to the Special Counsel Michael Dreeben, Senior Assistant Special Counselor Andrew Goldstein, Assistant Special Counsel Aaron Zelinsky, and Assistant Special Counsel Elizabeth Prelogar. After being advised of the identity of the interviewing agents and the nature of the interview, Bannon provided the following information:

[REDACTED]

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[REDACTED]

b5 per DOJ/OIP

[REDACTED]

b5 per DOJ/OIP

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[REDACTED]

b5 per DOJ/OIP

Investigation on 02/14/2018 at Washington, District Of Columbia, United States (In Person)

File # [REDACTED] Date drafted 02/26/2018

by [REDACTED]

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[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2), On 02/14/2018, Page 2 of 37

b5 per DOJ/OIP

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[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 3 of 37

[Redacted]

b5 per DOJ/OIP

[Redacted]

b5 per DOJ/OIP

[Redacted]

b5 per DOJ/OIP

[Redacted]

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[Redacted]

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[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 4 of 37

[Redacted]

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[Redacted]

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[Redacted]

b5 per DOJ/OIP

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[Redacted]

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[Redacted]

b5 per DOJ/OIP

[REDACTED]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 5 of 37

b5 per DOJ/OIP

b5 per DOJ/OIP

After Sessions recused, Trump screamed at McGahn about how weak Sessions was. [REDACTED]

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[REDACTED]
[REDACTED] Trump was as mad as Bannon had ever seen him. [REDACTED]

b5 per DOJ/OIP

Bannon told Trump Sessions' recusal was not a surprise. He said they had talked about it back in December. [REDACTED]

b5 per DOJ/OIP

b5 per DOJ/OIP

Trump wanted a lawyer like Roy Cohn. He wanted an Attorney General like Bobby Kennedy. [REDACTED] He thought of them as b5 per DOJ/OIP people who really protected their President. Trump thought Holder always stood up for Obama and said Holder even took a contempt charge for Obama and that Bobby Kennedy always had JFK's back. [REDACTED]
[REDACTED]
[REDACTED]

[Redacted]

(U) Interview of Stephen K. Bannon (Day

Continuation of FD-302 of 2) , On 02/14/2018 , Page 6 of 37

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

winner, [Redacted] Trump thought he was a
he was a fixer, someone who
got things done. [Redacted]

[Redacted] b5 per DOJ/OIP

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b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 7 of 37

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

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[Redacted]

(U) Interview of Stephen K. Bannon (Day

Continuation of FD-302 of 2) , On 02/14/2018 , Page 8 of 37

[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

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[Redacted] b5 per DOJ/OIP

[Redacted] b5 per DOJ/OIP

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[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2), On 02/14/2018, Page 9 of 37

[Redacted]

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[Redacted]

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[Redacted]

b5 per DOJ/OIP

[Redacted]

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b5 per DOJ/OIP

[Redacted]

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[Redacted]

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[Redacted]

Bannon heard

[REDACTED]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 10 of 37

about conflicts with the Special Counsel from Trump. Trump told him there were issues involving Mueller and Trump's golf course in Northern Virginia, because Mueller had been an equity member at the club but moved and wanted to be cashed out; Mueller was former law partners with [REDACTED] [REDACTED] and Mueller was the first person they talked to about serving as the FBI Director. Bannon thought those issues were raised soon after Mueller was named Special Counsel. [REDACTED]

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[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 11 of 37

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b5 per DOJ/OIP

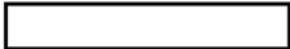
b5 per DOJ/OIP

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June 2016 Trump Tower Meeting

Bannon had no knowledge of the June 2016 Trump Tower meeting at the time it happened. It was before his time on the campaign. He thought he heard about it from Mark Corallo on a Saturday morning when Trump was en route back to the United States from an overseas trip, or possibly even a day or two before. He heard about it in relation to a media story. Bannon added that before Trump left on the trip, Corallo was in good standing with Trump and Bannon had considered making him Communications Director.

Bannon heard there was an email from Corallo, who mentioned in passing "the lawyers" had an email, or possibly that Marc Kasowitz had gotten an



(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 12 of 37

email from a server. Bannon did not go to the G-20 with Trump. He stayed back to work on the outside law firm. He eventually learned not just their lawyers had the email but instead "everyone" had it.

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(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 13 of 37

[Redacted]

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[Redacted]

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[Redacted]

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[Redacted]

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[Redacted]

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[REDACTED]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2), On 02/14/2018, Page 14 of 37

[REDACTED] b5 per DOJ/OIP

Bannon reviewed a document Bates stamped SB_00006329. The Guardian and the Financial Times did articles at the same time linking Felix Sater and Kushner. Bannon knew [Special Counsel prosecutor] Andrew Weissman had put Sater away previously for money laundering.

Bannon knew Kushner was on vacation off the coast of Croatia with a Russian billionaire when Bannon took over the campaign. Kushner was with Wendy Deng, the Russian billionaire, and the Russian's girlfriend. Bannon said his friends in the intelligence community said the girlfriend was "questionable." Bannon called Kushner and told him to come back from vacation. They had 85 days to go, no money and they needed Kushner to come back and fire Paul Manafort.

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 per DOJ/OIP

[REDACTED] b5 Per DOJ/OIP

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[Redacted]

(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 15 of 37

[Redacted]

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[Redacted]

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[Redacted]

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[Redacted]

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[Redacted]

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(U) Interview of Stephen K. Bannon (Day
Continuation of FD-302 of 2) , On 02/14/2018 , Page 16 of 37

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Bannon first met Trump in August of 2010. Their first meeting was approximately 2 hours long. David Bossie was present and said that Trump was thinking of running for president in 2012. Bannon said "for what country?" It was a 2 hour presentation on a possible presidential run in

FBI(19cv1278)-147

[REDACTED]

(U) Interview of Stephen K. Bannon (Day
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2012. After that, Trump went on Bannon's radio show and did some things for Breitbart. Bannon had spent approximately 30 minutes combined with Trump outside of Bannon's radio show approximately 3-4 times.

In 2015 Bannon got to know some of the "outsiders" in the 2016 presidential race, and at that time he got to know [REDACTED] and began to talk with him quite a bit. Bannon never spoke to [REDACTED] one on one, just over the phone. At one point Bannon had spoken to [REDACTED] for approximately 5 minutes, close to June 2016, on a topic related to immigration or something similar. Bannon eventually became more in touch with the presidential campaigns of Ted Cruz, Ben Carson, and Trump. Bannon did have some conversations over the phone with Corey Lewandowski. Bannon's news organization was anti-establishment, so they interacted with that brand of candidate.

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When the presidential primaries ended, Bannon had the same type of relationship with Trump. Bannon and Trump rarely spoke besides setting up an interview or Trump coming onto Bannon's show. Bannon was interacting with populist, anti-establishment camps such as Cruz.

Bannon had read a NYTimes article describing the Trump campaign being in disarray, so he started to make a few phone calls. At the time, Trump was 12-16 points down, there was talk of the Republican National Committee (RNC) cutting Trump loose, and the Republicans were talking about distancing themselves from Trump for fear of losing control of the House of Representatives. Bannon called [REDACTED] and there was worries that if Bannon became involved in the Trump campaign, Breitbart could be blamed if Trump lost. Bannon had previously talked to [REDACTED] back in June 2016 in an effort for them to make peace with Trump. The [REDACTED] had a Super PAC that was anti-Hillary Clinton and the [REDACTED] asked how they could help. Bannon wanted to bring KellyAnne Conway and David Bossie in to help as well. Bannon flew out to Woody Johnson's house and talked to Trump that night when he arrived. Bannon told Trump he would take the position as Campaign Chief Executive.

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At the time Trump was 16 points down, the campaign had no organization, no money, 75% of the population thought the country was in decline, they were working with the "deplorables," and Bannon had a 100% certitude that they would win. Bannon believed the big task was to give people permission to vote for Trump as commander in chief.

The next day Bannon met with Manafort, which was the same time that the news about the "Black Ledger" was breaking. Bannon was at campaign headquarters when Manafort told Bannon to come up to Trump Tower. When Bannon arrived, Manafort showed him something about a NY Times story about the "Black Ledger" and \$15 million dollars from the Ukraine. Bannon asked

[REDACTED]

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when this story was coming out. Manafort replied that he had known about the story coming out for approximately 2 months and had not gotten involved in it. Bannon subsequently told Trump to keep Manafort, to not fire him, and to keep him around for a couple of weeks. Bannon called Kushner, and asked him to get back in order to do something publicity wise to counteract the negative press surrounding the story. Trump had asked Bannon at one time about "what was this thing with Manafort out of the Ukraine," and they talked for approximately 15 minutes on it. Trump was never linked with other Russian news stories at the time, and he believed Manafort was a promoter. Trump was more worried about how they story made them look. Bannon believed that Trump talked with Manafort about the story.

Bannon was involved in all aspects of Trump's debate preparation. Bannon helped Trump talk and think through various topics related to national security and foreign policy. The idea of working with Russia to fight ISIS was "thrown out there". Flynn or Keith Kellogg might have come up with the idea, with the reasoning that since Russia was dealing with similar problems in Chechnya, they might be an ally to help. Bannon never specifically remembered hearing the phrase "knock the hell out of ISIS," but that could have become a catch phrase. Overall, Trump had a non-interventionist stance. During the campaign they were mainly trying to play defense, it was a very basic strategy, and they were trying to get Trump to not say something "insane." Flynn might have brought up the idea of partnering with Russia on fighting ISIS, but not on a geo-strategic level. Trump's stance was more or less that Russia did not have to be an enemy.

b5 per DOJ/OIP

[REDACTED]

[REDACTED]

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[REDACTED] b5 per DOJ/OIP

Bannon first met Erik Prince 8 to 9 years ago. Bannon made a film about Fallujah and he asked Prince to be involved. Bannon wanted to show the film to Prince for accuracy. The next time Bannon spoke to Prince was when he came out with a book, "Warrior something." It was approximately 2014-2015 and Prince had started coming onto Bannon's show.

Bannon and Prince would talk about Islamic radical terrorism. Prince knew the Middle East, Asia, and sub-Sahara Africa. Prince was a former Navy SEAL, contractor for the government, and ran his own mercenary company. Bannon described Prince as a "smart guy." Bannon never really had a foreign policy talk with Prince for the Trump Campaign, but Prince was not shy about sharing his ideas.

Bannon was shown Document #1, email dated 9/8/2015 from Prince to Bannon, subject "Talking Points, second attempt". Bannon stated that he did not remember passing it along, but it sounded like something he would do. Bannon was in daily contact with [REDACTED] until he was let go in August. After that, Bannon would contact Lewandowski nearly every day. Bannon did not remember discussing the memorandum attached to the email, but said he would have sent something forward like it.

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Bannon reviewed a document Bates stamped SB-00018818. Bannon stated he did not remember the email, but it would be something he could have done. Bannon could not remember if Prince briefed the candidate, but Bannon did put Prince in contact with Flynn.

Bannon was not in regular contact with Prince. Bannon spoke with Prince a couple times a month by phone. Prior to Bannon joining the campaign, he spoke with Prince infrequently. Bannon estimated it to be once a week to once every couple of weeks. Bannon and Prince would generally talk about international affairs.

Bannon was shown Document #3, email dated 12/12/2015 from [REDACTED] to Bannon with [REDACTED] cc'd, subject "Re: Breitbart News." Bannon stated that [REDACTED] was Breitbart's [REDACTED] Bannon introduced [REDACTED] to [REDACTED] in order for [REDACTED] to be a source for the article referenced in the email about data collection.

b6
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Bannon was shown Document #4, email dated 1/14/2016 from Bannon to Prince, subject [REDACTED] Bannon explained that Prince said he knew people from his new company. Bannon knew a quality guy from [REDACTED] and he [REDACTED] Bannon thought that if Bannon could connect him to some security guys, this guy might be of help. Prince

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[REDACTED]

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had connections in the intelligence community that might be looking for his talents. Bannon did not think that Prince followed up on it.

Bannon was shown Document #5, email dated 3/17/2016 from Prince to Bannon, subject "Re." From this email, Bannon did not remember if Prince actually came on his show. Prince was "on the right" and was a highly thought of guy.

Bannon was shown Document #6, email dated 5/23/2016 from Prince to Bannon, [REDACTED] cc'd, subject "Fwd: Recommended meeting." Bannon did not remember the email exchange. Bannon doesn't remember meeting with Oleg. Prince viewed Bannon as someone with a good relationship with Trump.

b6
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Bannon was shown Document #7, email dated 10/18/2016 from Prince to Bannon, subject "Russia/US election." Bannon did not remember this email or whether he prepared a speech as referenced in the email. Bannon stated that Prince was not short on ideas. Bannon thought the email was more in reference to Clinton than the Russian influence issue. Bannon thought the email might be on changing the narrative to Clinton as an alternative to the stories in the news about Russian election influence. Bannon did not remember talking to Prince about the email or about talking to Prince about Russian influence.

Bannon described the 14th floor as "loosy goosy" and Prince might have come through from August to the Election Day, but he was not certain. Prince would often have ideas on how he could help them with the debates. Bannon did not specifically remember how many times he met with Prince at Trump Tower during the campaign, but estimated it to be a couple of times. A couple of times Prince would email his ideas to Bannon. Bannon might have asked for Prince's ideas on a certain issues. Prince knew Conway, Bossie, [REDACTED] Bannon did not know if Prince provided advice for any of them. Prince was a known entity in the campaign and might have walked around and met people and have come through the 14th floor. Once someone was on the 14th floor they could walk around freely. Prince could contact [REDACTED] or someone in security in order to gain access.

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Bannon was shown Document #8, email dated 11/16/2016 from Prince to Bannon, subject "Fwd: Bannon." Bannon didn't remember this email. Bannon did not know whether Prince was in touch with Mark Corallo. Prince had just offered his help.

After the election, during the transition timeframe, Bannon continued to interact with Prince. Prince had come by to speak with Flynn and Bossie approximately 3 to 4 times. Prince came to New York approximately 5 to 6

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times to speak to people other than Bannon such as Flynn, K.T. McFarland, Bossie, Kellogg, Conway, [REDACTED] Sebastian Gorka and [REDACTED] Bannon remembered walking by and seeing Prince in the "war room" with [REDACTED] Prince would tell Bannon who he was seeing. Prince would not officially schedule meetings with them. Flynn, Kellogg, Bossie, and Conway had known Prince before then. Prince would come in and sit down and talk about foreign policy. Prince would suggest people they should be getting on board and people to include in the administration. Bannon would bounce ideas off of Prince and talk about such people as Mike Pompeo. The things Prince said were not too crazy and people respected him. Prince had other contacts within the intelligence community. Bannon, Flynn, Bossie and Kellogg had spoken of Prince. Bannon and Flynn had talked with each other about Prince saying he was a good guy.

b6
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Prince came by to see Bannon approximately 3 to 6 times. Prince would come by and talk to one of Bannon's assistants in order to get in. Security at Trump Tower was not overbearing. When they talked, Bannon did talk to Prince about ISIS. Bannon did not particularly remember talking to Prince about Russia in regard to ISIS, but would not be surprised if it came up. Prince did not meet with then candidate Trump, but Bannon thought Prince was close to Eric Trump and Trump Jr. Bannon remembered Prince stopped by during the campaign and asked if Trump Jr was there. Bannon knew Prince would go hunting with Eric Trump and Trump Jr. During the campaign, Prince might have met with Trump Jr, and Bannon remembered that one time Trump Jr might have walked Prince down. Prince met with [REDACTED] [REDACTED] during the campaign as well. Prince always had ideas on what was going on, but Bannon did not remember any of Prince's policy papers making it to Eric Trump or Trump Jr.

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Bannon stated he didn't know Rick Gerson.

b5 per DOJ/OIP

Bannon was involved in the September 2016 meetings with Abdel Fattah El-Sisi and Benjamin Netanyahu. It was Kushner's idea to work toward a summit with Egypt, the UAE, and Saudi Arabia and that Trump would go to this summit in the 1st 6 months of his presidency. MBZ came over as a way to

[REDACTED]

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get to know the incoming administration. It was obvious to Bannon that Kushner was told of the meeting prior and had helped set it up. Kushner had talked to MBZ's guys in the U.S. in order to set it up. They met with approximately 25 of the UAE attendees in the lobby, including UAE Ambassador to the U.S. Yousef Al Otaiba, and after approximately 6 to 7 minutes they went up to the penthouse of the Four Seasons. When Bannon walked into the penthouse, he saw another 15 UAE attendees already in the room. Bannon wondered what this meeting could be about. Bannon saw a guy who looked like Sean Connery and realized it was MBZ. MBZ was in jeans and a t-shirt, dressed in casual attire. It was apparent to Bannon that Kushner knew Otaiba and that it wasn't the first time they had met. Bannon believed that the Obama administration had disengaged from the Middle East, which is similar to what El-Sisi and Netanyahu had said. During the meeting with MBZ they discussed the ISIS threat to the area. Bannon did not remember if they discussed Russia, but if they did, it was targeted to the Persian Gulf area. Bannon remembered they talked about Persian expansion, Iran, Baghdad, Beirut, and Hezbollah. The meeting was approximately 2 hours long. Bannon thought that Nader was one of the group of 15 or 25 guys they met as MBZ "held court" for a couple hours. If Nader was there, Bannon believed they just introduced themselves, and shook hands.

[REDACTED]

b5 per DOJ/OIP

[REDACTED]

b5 per DOJ/OIP

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[REDACTED]
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[REDACTED]

b5 Per DOJ/OIP

b5 Per DOD

[REDACTED] had at one time come to Bannon and said he wanted to do something
[REDACTED] Bannon asked [REDACTED] if [REDACTED] was a
good guy, [REDACTED] Bannon wanted to
know if [REDACTED] Bannon
asked [REDACTED]

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[REDACTED]

[REDACTED] Bannon later found out
that [REDACTED]

[REDACTED] Bannon did not recall [REDACTED] talking about [REDACTED] then. Bannon
discussed [REDACTED] was going to go over to
meet with [REDACTED]

[REDACTED]
[REDACTED]

Bannon had been working on a proposal to move the Israeli capital to
Jerusalem, the Christian right movement, putting money into a 501(c)(4)
using UAE money or "those guys" which didn't end up happening, and putting
together a security conference over in the Middle East in the Spring
/Summer of 2017. Bannon last saw Nader 2 to 3 months ago. Bannon had too
much going on with the C4 and life in general. Bannon had seen that the
Special Counsel's Office had called Nader to the Grand Jury, but Nader had
not reached out to Bannon.

[REDACTED]

b5 per DOJ/OIP

[REDACTED]

b5 Per DOD

[REDACTED]

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b5 Per DOD

[REDACTED]

When shown a photo of Rick Gerson, Bannon stated that this was the college roommate of Kushner, and that he was pretty sure he was the hedge fund guy he referenced earlier. Gerson had a hedge fund on Madison Ave in New York City at Barneys Tower. His office was 2 blocks from Trump Tower on 60th and Madison Ave. Gerson knew a lot about the Middle East and said many intelligent things about it. [REDACTED]

b5 per DOJ/OIP

b5 per DOJ/OIP

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[REDACTED]

Bannon thought he heard that Nader was being called into the Grand Jury for the Special Counsel's Office in the newspaper, but then said that he could be wrong.

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b5 per DOJ/OIP

[Redacted]

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b5 per DOJ/OIP

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b5 per DOJ/OIP

b5 per DOJ/OIP

Bannon was familiar with the story of Prince's meeting in the Seychelles from what he read in the paper. Bannon thought he discussed the article with Prince after it came out, and he might have discussed it with him around the time of the inaugural. Prince did not tell Bannon prior to the

[REDACTED]

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meeting in the Seychelles. After the article came out Bannon asked Prince about the meeting. Prince said he was over in the Seychelles and it was suggested he meet at a bar with these guys, and it was blown out of proportion. Prince did not say, and Bannon did not ask, if it was set up in advance. During the inauguration, Prince did not say anything about meeting with the Russians. Bannon did not recollect receiving a text from Prince around the time of Prince's trip to the Seychelles in January 2017. Bannon did not have prior knowledge of Prince going to the Seychelles and meeting with a Russian. Bannon was not aware of Nader's involvement in setting up Prince's meetings in the Seychelles. Bannon did not know that Prince would be meeting with MBZ or officials from the UAE. Bannon had not discussed the Seychelles meetings with Prince after the 2nd time he spoke with Prince about it after the article came out in April 2017. Bannon did not discuss Prince's Seychelles trip with anyone in the administration, and was not aware of Prince reporting his trip to anyone in the administration following his return. Bannon did not know Kirill Dmitriev nor had he ever heard of him. Bannon did not know of the Russian Domestic Investment Fund (RDIF). Bannon read Prince's testimony to the U.S. House of Representatives Permanent Select Committee on Intelligence (HPSCI), in which he read about "a Russian guy at the bar," but he did not discuss Prince's testimony with anyone in the administration. Bannon did not anticipate his name coming up in Prince's HPSCI testimony. One of the newspapers said Bannon setup the Seychelles meeting, but Bannon did not discuss that with Prince or anyone else. Bannon stated he was not involved in sending Prince to the Seychelles. Bannon did not know where the leaks came from on Bannon sending Prince to the Seychelles. Bannon might have commented on it publicly. Bannon had not had knowledge of the UAE sovereign wealth fund or the RDIF. Bannon was not aware of any conversations or discussions on sanctions of Russia with the UAE. Bannon was not aware of Mubadala but during one of the visits he might have been a person that Bannon had met. Nader never told Bannon anything about the Prince meeting in the Seychelles and never talked about that meeting with Bannon. Bannon had not had any discussions with representatives from the UAE about Prince's meeting in the Seychelles.

[REDACTED]

b3
b5 Per DOD

[REDACTED]

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b3
b5 Per DOD

b4 per DOD
b5 per DOD
b5 Per DOJ/OIP

Michael Cohen was one of the lawyers on Trump's staff. Bannon described Cohen as a fixer and a problem solver. In 2010, Cohen came down to the first meeting Bannon had with Trump and introduced himself as a political advisor. When Bannon was on the Trump Campaign, Bannon did not want Cohen wandering around the Trump Campaign organization. Bannon thought it could get them in a lot of trouble since Cohen goes off "halfcocked" a lot. Cohen kept trying to get involved in the Trump Campaign. Bannon described Cohen as the kind of guy who thought it would be a good idea to send \$130,000 to Stormy Daniels.

Bannon reviewed a document Bates stamped SB-00013127. Bannon was told "zero" deals involving Russia and the Trump Organization. Candidate Trump would say he didn't know any Russians and there was no collusion. This came up during the campaign a couple of times. Bannon never asked Trump about any Russian business deals. In regard to the emails reference to Felix Sater, Bannon stated that this went back to the House Intelligence Committee, that they had a signed term sheet in December 2015 on Trump Tower Moscow. This was a big deal to Bannon, and Bannon described it as a "big reveal."

b5 per DOJ/OIP
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[REDACTED]

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[REDACTED]

b5 per DOJ/OIP

[REDACTED]

b5 per DOJ/OIP

b6
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Bannon was not aware of any financial agreements to Daniels, other accusers, or other relationships of Trump. Bannon talked to Breitbart guys about the \$130,000 payment, but not to anyone in the administration. Bannon was not aware of any other payments made. When asked to speculate about the \$130,000 payment Bannon thought it might be David Pecker, since he did not think anyone around "Trump.org" would be dumb enough, and they would have worried about the impact to the election.

[REDACTED]

b5 per DOJ/OIP

Bannon never heard of Cohen arranging for Trump to give a speech on an online platform or talk about Cohen's concepts for "Trump.org". Bannon had

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read a New York Times article about business dealings with Russia and the candidate/"Trump.org". Bannon was aware of the article before he became involved in the Trump campaign. When Bannon was on the Trump campaign, he never discussed the stories that came out involving then candidate Trump during March/April of 2016. During the later stages of the campaign, when the story broke about Trump's house in Palm Beach, Bannon discussed it with Trump and Trump had a plausible explanation. The story never gained any traction. Bannon never talked with Trump on how he thought all these stories on his business dealings with Russia was absurd. The story about Cohen reaching out to Putin's office in January 2016 in order to ask for help on Trump Tower Moscow was a big deal to Bannon and it countered what Bannon heard about Sater by candidate Trump. Bannon did some inquiries about it with his contacts at the Intercept, Fox, the Guardian and ABC News. There was no further information on this, which did not surprise Bannon.

Bannon was shown an email dated 9/28/2016 from Bannon to Cohen with Conway, Kushner, Stephen Miller, and cc'd, subject "Re: request from the ft." Bannon did not remember getting an email from Cohen about Sergei Millian, and doesn't remember any conversations about Millian. Bannon never had any conversations with the campaign on the Millian issue.

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b5 per DOJ/OIP

b5 per DOJ/OIP

Bannon reviewed a document Bates stamped SB-00018384. Bannon did not think this email referenced Cambridge Analytica. Bannon stated that as a private citizen, and lead of Breitbart, he was interested in finding Clinton's

[REDACTED]

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33,000 missing emails. The Government Accountability Institute (GAI) analysis was that the 33,000 missing emails were tied directly to the influence peddling of the State Department. Barbara Leeden knew someone who could work on finding the 33,000 and they had a half a dozen meetings on how to find them. They ascertained that if they would be able to find the emails, they still would not be able to validate their authenticity. They never obtained any emails or any samples and stopped the search. The 33,000 was related to the Clinton Cash book and the pay for play scheme.

Bannon reviewed a document Bates stamped SB-00018418. The green light referenced in the email was for a data operation for voter targeting. There was a presentation about it given to Lewandowski but the data operation people were not retained. Cambridge Analytica then became involved after Ted Cruz officially withdrew in May 2016. In June 2016, [REDACTED] offered an introduction for Bannon to Jared Kushner and Ivanka Trump. Bannon agreed and that was the first time he met Kushner and Ivanka.

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Bannon was shown Document #14, email dated 6/12/2016 from Bannon to [REDACTED] with [REDACTED] cc'd, subject "Re: Defeat Crooked Hillary | [REDACTED] Bannon did not remember sending the email and he never went to the United Kingdom. Bannon did not remember talking to [REDACTED] about meeting with [REDACTED] in general. Bannon would not characterize his response in the email, "Love it," as an approval to [REDACTED] suggestion to meet with [REDACTED] Bannon did not know if [REDACTED] or anyone from Cambridge Analytica, ever reached out to [REDACTED] Bannon thought they probably dropped the idea. Bannon had no idea where [REDACTED] [REDACTED] of Cambridge Analytica and he was focused on getting their data business growing in the U.S. [REDACTED] had a lot of "James Bond" ideas like this idea on [REDACTED] and characterized it as [REDACTED] saying he "knows a guy, who knows a guy."

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George Papadopoulos had emailed Bannon during the campaign in an effort to setup a meeting with Egypt. The campaign had decided to take a couple days off during a visit to the U.N. in order to meet with foreign leaders. Bannon was initially against it. Bannon thought Trump's biggest challenge was selling the public that Trump could be Commander in Chief, so therefore he decided to do it and limit the meetings to a few key leaders such as Egypt, Israel, and maybe a couple of others. Kushner wanted a meeting with Israel, and Bannon and Flynn were pushing for a meeting with Egypt. Bannon never worked with Papadopoulos on setting up the meetings despite Papadopoulos's offers through email. Bannon would generally blow off Papadopoulos and thought to himself "I don't need this guy." Flynn would be on the hook for the meetings Papadopoulos was suggesting, and Bannon did not need Papadopoulos. Papadopoulos never told Bannon about the

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[redacted]

Russians having dirt on Clinton, and Bannon never heard Papadopoulos tell anyone else in the campaign, such as Sam Clovis, that the Russians had dirt on Clinton. Bannon had all the dirt he needed from Clinton Cash and Uranium One, he didn't need any more dirt. Bannon didn't need any more dirt from "clowns" like Papadopoulos and Clovis.

b6
b7C

Bannon first met Stone by email or by phone in 2013-2014 while he was working for Breitbart. In 2015, during Stone's involvement with the campaign, Stone would come on Bannon's radio show every so often, write articles, and do interviews. Stone was in Trump's orbit. At the time, [redacted] was running the campaign, and Bannon described it as a "one man band." Bannon thought [redacted] had done "a damn good job." Bannon thought Stone was a guy with a "sketchy background" and who could "blow you up." Bannon did not think Stone had a relationship with [redacted] but [redacted] was trying to get business from Stone. Bannon did not remember introducing [redacted] to Stone, but stated he might have.

Bannon was shown Document #15, email dated 1/7/2016 from [redacted] to Bannon, Stone, and [redacted] subject "Data Guy in Trump Tower." Bannon thought [redacted] got the wrong name in the email, [redacted] who they got rid of. Giles Parscale had a little data center on the 15th floor. Bannon was introduced to a "data guy" there in January 2016, but Bannon didn't remember the name. Bannon speculated that maybe Stone had some ideas about it, but Bannon did not think it was [redacted] who was involved.

b6
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Bannon was shown Document #16, email dated 5/4/2016 from Stone to Bannon, subject "Re: Congrats." Bannon described the email as "kind of an Atta boy." Stone is a guy you want to keep happy. Lewandowski pushed Stone out, and Trump's kids hated Stone. [redacted] Bannon believed it was best to make these guys feel that they were a part of this.

b6
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Bannon was shown Document #17, email dated 5/7/2016 from Stone to Bannon, subject "I am." Bannon did not remember receiving this message, and believed the "highest level" reference was about some [redacted] type" backers. At the time, Stone was of the guys who was "kind of banned."

b6
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In August 2016, Kushner was in charge of the digital campaign and fundraising. Bannon was the CFO of the campaign with Jeff Dewit. The campaign had almost no cash and they were receiving only a small amount from online contributions. The campaign was losing cash at the time and they were down by a double digit lead with the 1st debate coming. They needed \$50 million from Trump, which eventually became \$10 million. Afterwards, they were still down by 3 ½ points.

[REDACTED]

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Bannon was shown an email dated 4/20/2016 from [REDACTED] to Bannon and Stone cc'd, subject "Re: Cambridge Analytica." Bannon did not remember this email.

b6
b7C

Bannon was shown an email dated 5/04/2016 from [REDACTED] to Bannon, subject "[No Subject]." Bannon thought this looked like the same \$20 million from the email in Document #17. Cambridge Analytica claimed they could help micro-target voters on Facebook. Stone tried to raise \$20 million and it might have been for a project for Cambridge Analytica.

Bannon was shown Document #18, email dated 8/19/2016 from Stone to Bannon, subject "Initiative-debates." Bannon thought there was an effort, which he heard were funded by some high net worth republicans, to get Jill Stein on the ballot. Bannon was unaware of Stone and Manafort's efforts were in regards to this, which is referenced in the email.

Bannon was shown Document #19, email dated 8/18/2016 from Bannon to Stone, subject "Re: Congratulations." Bannon did not remember, but he might have talked to Stone about this email. Bannon did not recollect the plan Stone referenced in his email. Stone took credit for taking the Bill Clinton accusers to the 2nd debate. Bannon did not have a conversation with Stone on how to "play the new media" as referenced in the email.

Bannon was shown Document #20, email dated 8/26/2016 from Bannon to Stone, no subject. Bannon stated that Stone was a guy that he wanted to keep happy. Bannon did not remember what the ideas were that he wanted to talk to Stone about referenced in the email. Bannon described Stone as a "nasty piece of work", who got rid of Lewandowski by leaking stories, and Bannon wanted to keep him happy.

Bannon was shown Document #21, email dated 8/30/2016 from Ted Malloch to Bannon with Stone and the email address [REDACTED] cc'd, subject "The debate." In reference to the email, Bannon stated he had no contact with Jerry Corsi. Bannon was not going to touch Corsi, who was blaming Bannon saying Breitbart was dead and he blamed Bannon for it. Malloch was a writer and professor at a faculty in London. Bannon knew him from Breitbart London. Bannon did not meet with Stone personally during the campaign, and Bannon felt if he ever would have needed to sit down with Stone, it would have been to just keep Stone happy. Bannon didn't recollect any Stone conversations about WikiLeaks and Assange.

b6
b7C

Bannon was shown Document #22, email dated 10/4/2016 from Stone to Bannon, subject "Re:" Stone had an obsession with the [REDACTED] story and was asking [REDACTED] to give him some money to help him with it. Bannon did

b6
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not remember his Assange statement as referenced in the email, but it might have been in relation to what Assange said that day. Bannon did not remember what they were discussing in that email with Stone, but in regards to the "load" referenced in the email, Bannon thought it might have been Assange's promised emails.

Bannon was shown Document #22 again, the email dated 10/4/2016 from Stone to Bannon, subject "Re:" Bannon suspected that Boyle told Stone to forward this information to Bannon, and Bannon did not have time for this. Bannon thought the information came off some Drudge Report link, or maybe Stone was telling what he knew about Assange. Bannon believed that Assange was a "non-event." Bannon wanted to keep Stone happy, and Stone was upset that Bannon was not calling him enough, and he was making threats that there were scores to be settled. Stone did not get this information from Bannon. Bannon thought if Assange had the 33,000 verified emails, he would have put them out. Bannon believed that Assange was bluffing and there was nothing there. Bannon never put much stock in what Assange said, because he thought if he had the 33,000 missing emails, they could never be verified. The question from Bannon in that email, "What was that this morning???" Bannon did not remember what he was talking about for sure, but it was probably about Assange. Bannon did not know if Stone had a relationship with Assange or not, but at the time, Bannon believed he did not. Bannon did not remember if Assange had a press conference the day of this email. Bannon believed that was kind of a sideshow, and Bannon was busy running a campaign. Stone said he had some relationship with Assange and he told that to Bannon by phone. Bannon could not remember, but it was plausible, that Stone called and talked to Bannon about WikiLeaks. Bannon did not remember what the "load" Stone referenced in his email was, but it sounded like email payloads and he thought he was going to drop information on emails.

Bannon was always interested in the missing 33,000 emails, but was not interested in the John Podesta information since he believed it was not going to impact the election. Bannon clarified that he was talking to Stone about Assange in these emails. There was a belief that Stone had a relationship with Assange, Stone was public about it, and was telling reporters. Stone may have told Bannon about it, and it was implied that Stone has some inside information. Bannon was interested in the verified missing 33,000 emails and how it related to Uranium One. Bannon might have talked with Stone, at one time, about the 33,000 emails. Bannon did talk to Candidate Trump about the 33,000 missing emails. After Bannon came onto the campaign, it got into Candidate Trump's "head" that the 33,000 emails might be important. Trump was focused on "crooked Hillary" and the Uranium One story, and thought the 33,000 missing emails might unlock it. They never discussed that the Russians might have them. Bannon thought that

[REDACTED]

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some hackers in Bulgaria might have them. There was not much of a response from Trump and every now and then he would bring up the 33,000 emails. One time when the Podesta emails were released, Trump asked if it was a big deal. Bannon never discussed Stone or Assange with Trump. Flynn or Kellogg might have had a disc on finding the 33,000 emails. Bannon thought Flynn might have had an idea about using an outside company and finding the 33,000 missing emails. If it was anything cyber related, Bannon would always refer them to Parscale and the Cyber guys. Bannon did not think the WikiLeaks releases were that big of a deal, the important information was the 33,000 missing emails. Kellogg thought the same thing, and he was not a cyber guy. Priebus and Miller had talked about the 33,000 missing emails.

After the Billy Bush story broke, one hour later the Podesta emails were released. Bannon never talked to Stone about his quote "it will be Podesta's turn in a couple of weeks." Bannon might have discussed the Podesta releases with Stone, but Bannon never thought the Podesta releases were a big deal and they would not have a big impact on the campaign. Bannon never gave Stone information to give to Assange and was not aware of anyone else on the campaign giving information to Stone in order for him to give it to Assange.

Bannon knew [REDACTED] had sent some emails to Bannon. Bannon described [REDACTED] Bannon didn't take any action in relation to [REDACTED] emails. Bannon did not remember talking to [REDACTED] while he was on the campaign.

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Bannon never heard of the Committee for American Sovereignty Education Fund. Bannon didn't have any direct involvement in Stone's 501(c)(4) fund, but he might have helped introduce Stone to others, such as the [REDACTED] Bannon thought Stone's 501(c)(4) and Super PAC were involved in helping the candidate with commercials and "anti-Hillary stuff." Bannon thought Stone was pushing more [REDACTED] related information and he might have sent Bannon some spots he was running. Bannon didn't remember discussing any of Stone's strategies with him, but Stone might have run some [REDACTED] stuff by Bannon. Bannon thought that Stone's [REDACTED] efforts were a "crack-pot idea."

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Bannon was shown Document #23, email dated 9/28/2016 from Stone to Bannon, subject "Fwd: DW - The Plan." Bannon didn't know the demographics Stone was targeting, but they did have a discussion how to influence the African American vote.

Bannon was shown Document #25, email dated 9/28/2016 from Stone to Bannon, subject [REDACTED] There was an idea to invite [REDACTED] to the last debate and make a big deal about it. Stone had put up a link to a video in relation to the [REDACTED] story, which is what was referenced in the email.

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[REDACTED]

(U) Interview of Stephen K. Bannon (Day
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Bannon might have discussed Stone's 501(c)(4) with him via phone, but Bannon did not want to be associated with the [REDACTED] story. Bannon didn't want to cross Stone, so he was trying to be cordial about it. Bannon was not even sure if he talked to Prince about Stone's ideas for the [REDACTED] story.

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Bannon was shown Document #26, email dated 10/21/2016 from Stone to undisclosed recipients, with Bannon, Prince, [REDACTED] bcc'd, subject "Re: DW analytics update." Bannon did not remember this email, although he recognized the email addresses for Prince, [REDACTED] [REDACTED], and people would often go to him in an attempt to get something to candidate Trump. Bannon did not remember discussing [REDACTED] with candidate Trump, [REDACTED] or anyone else on the campaign. Stone stated that he was in regular contact with candidate Trump, although Hicks had said Stone was not in regular contact with Trump.

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Bannon was shown Document #27, email dated 10/22/2016 from Bannon to Stone and [REDACTED] no subject. Bannon talked to [REDACTED] about Stone's 501(c)(4) and told her that Stone was looking for money. Bannon recommended Stone, although he thought the chances that the [REDACTED] donated money would be remote. This was again Bannon's attempt to keep Stone happy. Bannon did not know if Prince provided money to Stone, but he was pretty sure the [REDACTED] did not. Prince was going to have fundraiser for Trump and considered it his commitment to the campaign. Bannon did not remember introducing Stone to any other donors. Bannon did not remember helping any other find funding besides Stone. Bannon was weary of involving himself with a 501(c)(4) and was only helping out Stone because he did not want to be "lit up" by Stone. Bannon did not see it as a potential coordination issue working with Stone's 501(c)(4). No other 501(c)(4) was giving Bannon advance notice like Stone's and no other 501(c)(4) was Bannon putting in touch with donors like Stone's.

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Bannon was shown Document #29, email dated 9/21/2016 from Trump Jr to Bannon, Conway, Kushner, Bossie, and [REDACTED] subject "Wikileaks." Bannon did not remember receiving this message, but it was during the campaign timeframe. Bannon did not remember anyone else in contact with WikiLeaks or trying to get in contact with WikiLeaks. There was discussion during the campaign on how WikiLeaks would impact the race. Bannon did not think anyone had any ideas on where WikiLeaks had got their information. Bannon did not remember anyone reaching out to Stone, WikiLeaks, or any other intermediary to see what information might be coming.

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[REDACTED]

(U) Interview of Stephen K. Bannon (Day
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Bannon was shown Document #32, email dated 11/5/2016 from Bannon to Kushner and Bossie, subject "Re; Securing the Victory." Bannon stated that Manafort had zero involvement in the campaign after he left. Bannon thought if they responded to this email from Manafort, Manafort would be telling that to everyone. Bannon was not aware of any instances of Manafort advising, or being involved in the campaign after his ouster. Hicks said he was not involved, and she would have a sense on who Trump talked to. Candidate Trump never said to Bannon that he was in contact with Stone or Manafort. Bannon knew they were going to win, and in this email he wanted to avoid Manafort because Bannon believed that if people could link them to Manafort, they could then try to link them to Russia.

Bannon had three cell phones. He did not use the campaign issued phone or the "secure phone." The iPad he was issued in the campaign he did not use much. Bannon was not aware that his cell phone was set up to not archive text messages, and someone else had setup his phone for him. It was a surprise to Bannon that his text messages were not archived. During the campaign and transition timeframe Bannon did not use secure apps. When Bannon got close to leaving the administration, he got ProtonMail and Signal. [REDACTED] helped him set up the ProtonMail which Bannon believed provided increased security. Bannon did not use ProtonMail to send or receive email from people in the administration. Bannon did not have a Slack channel and never used Slack. Breitbart used Slack, but they were trying to shut that down. Bannon setup a Wickr account after he left the administration after Prince talked to him about it being more secure. Prince talked with Bannon about using Wickr Pro for Breitbart. Bannon used Wickr with Prince and Signal with [REDACTED]. Bannon only started using Wickr and Signal after he left the administration. While Bannon was in the administration, he never heard of anyone using 3rd party apps. They received a briefing on how their communications needed to be kept for federal records. Bannon was not sure if his text messages were supposed to be kept under the federal records act. Bannon did not remember using his personal phone for White House business. Bannon did not remember using texting on his government devices, although he might have. Bannon did not remember any discussion of how his text messages should be saved, or his personal device texts should be saved. Bannon primarily used the white house email while he was in the administration. If Bannon received an email to his "arc-ent" email while he was in the White House, he would respond to it from the "arc-ent" account. He gave full access to his "arc-ent" email account to [REDACTED] in order for her to send them to the White House account to be archived. [REDACTED] might have helped with that as well.

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Administrative:

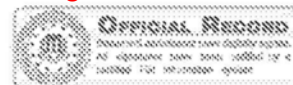
[Redacted]

(U) Interview of Stephen K. Bannon (Day
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The agent notes and documents shown to Bannon will be maintained in the 1A section of the case file.

Exhibit 18
Declaration of James A. Bowman

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM

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FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/11/2018

GEORGE NADER, date of birth (DOB) [REDACTED] was interviewed at 395 E Street SW, Washington D.C., by writer and SA [REDACTED] NADER was represented by attorneys [REDACTED] and [REDACTED] from Holland and Hart LLP. Also present at the interview were Senior Assistant Special Counsel (SASC) Zainab Ahmad, SASC Brandon Van Grack, and SASC Jeannie Rhee.

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AGENT NOTE: At approximately 9:55 AM, NADER's attorneys and SCO attorneys discussed the attached proffer letter. Ahmad explained the protections the proffer letter afforded NADER.

After being advised of the identities of the interviewing Agents and the nature of the interview, NADER provided the following information:

Seychelles

KIRILL DMITRIEV had been visiting the United Arab Emirates (UAE) on a regular basis, and NADER initially met DMITRIEV on one of those visits approximately 6 years ago. The Saudi Arabian and Russian relationship was poor at the time and the UAE was concerned about the political relationship. NADER was running the Middle East Insight publication. NADER considered himself as a friend who was working quietly behind the scenes in an effort to distance Russia from Iran, shift their favor towards Saudi Arabia due to what they represent in the Islamic world. During the BARACK OBAMA Administration, Iran distrusted Saudi Arabia and the UAE because they considered them proxies of the Americans, and therefore there was lack of trust.

In approximately 2012-2013, NADER went on a visit to Russia with former Saudi Arabian Ambassador Prince BANDAR as an unofficial friend. Their goal was to build a trusted relationship with Russia, and Vladimir PUTIN designated DMITRIEV to be their contact person for that relationship. DMITRIEV speaks English, was educated in the United States, well off, and is extremely articulate and pleasant. DMITRIEV wanted to build a Sunni relationship, was not an anti-American, was pro-Israel, and "pro-Arab". DMITRIEV was head of the Russia Domestic Investment Fund (RDIF) at the time and clearly had the backing of PUTIN. During the 5-6 separate visits

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Investigation on 01/22/2018 at Washington, District Of Columbia, United States (In Person)

File # [REDACTED] Date drafted 01/23/2018

by [REDACTED]

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[REDACTED]
Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 2 of 19

they had, DMITRIEV was always the contact person. At the beginning, the relationship between Russia and Saudi Arabia was bad, and nothing really happened during the [REDACTED] visit, just talk. In 2015, the financial relationship got better as the ambassadors from both Russia and Saudi Arabia changed. DMITRIEV was in charge of the entire political and financial relationship. NADER was not involved in the details, just facilitating on a strategic sense.

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DMITRIEV's relationship with the UAE and MOHAMMED BIN ZAYED (MBZ) started with [REDACTED] and the Saudi Arabian's approximately 5-6 years ago. MBZ visits Russia on a yearly basis and PUTIN introduced MBZ to DMITRIEV. PUTIN wanted DMITRIEV to be in charge of Russia's relationships in the Gulf Region. DMITRIEV had been educated in the U.S. and spoke fluent English. DMITRIEV was both pro-Israel and pro-Arab; and he was not anti-American. When MOHAMMAD BIN SALMAN (MBS) took over the leadership of Saudi Arabia, the relationship with Saudi Arabia and Russia got better. The UAE and Saudi Arabian relationship had not really been close until MBZ and MBS developed their partnership.

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The UAE and the RDIF have had co-investments. One of which included the MUBADALA Investment Company which is owned by an Abu Dhabi fund. Other UAE funds include EMAR and ADIA. MUBADALA invested hundreds of millions of dollars in oil and real estate through the RDIF. The relationship with MUBADALA, and others, with the RDIF did not expand, but it did not pull out after pressure was put on Russia from the enactment of U.S. sanctions due to Russian activity in the Ukraine. The same with the Saudi Arabians. NADER was not involved in the meetings on the business aspects, both before and after the U.S. sanctions. The Gulf Countries overall did not want to do anything that would conflict with the U.S., and in fact had committed to the U.S. way before they began to improve the relationship with Russia. They were more concerned with staying away from the "bad guys" such as Iran. The money invested in the RDIF was not growing at a good rate due to the U.S. sanctions. The RDIF had a guarantee that the amount of money initially invested could grow, but would never go below the initial investment. The RDIF had kept a "good face" in light of the sanctions, but DMITRIEV and the Russians complained about the U.S. sanctions. The UAE had serious considerations in not investing "a penny more" in the RDIF due to the sanctions. The UAE had discussions about the possibility of lifting the sanctions and complained about them, but the UAE and Saudi Arabia would not do anything to jeopardize their relationship with the U.S. The UAE thought that if Donald TRUMP or Hillary CLINTON got elected, they hoped the next administration would look to move

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 3 of 19

[REDACTED]

things forward in a positive way. The Middle East was impacted by the relations between the U.S. and Russia and therefore they wanted better relations.

The Saudi Arabians had invested in the RDIF and DMITRIEV received Saudi delegations in Russia. DMITRIEV prepared a visit for a Saudi delegation which came to Russia to discuss stabilizing and fixing oil rates, which succeeded and "everyone was happy".

Conversations between NADER and DMITRIEV involved discussion on Islamic extremists, Iran, and every issue the UAE cared about and DMITRIEV was supportive. DMITRIEV knew the bureaucracy in Russia, was keen on improving their relationships, and even changed the Russian view on Russia in regards to Yemen, in contrast to the situation with Syria. DMITRIEV was an interlocutor for PUTIN. NADER would report these conversations to MBZ.

DMITRIEV knew that NADER had good contacts within both presidential campaigns, and NADER told him as such. NADER's point of contact with the CLINTON Campaign was an individual named [REDACTED] DMITRIEV and the Russians preferred TRUMP, but NADER never heard of them speaking of efforts to help TRUMP win the presidential election. DMITRIEV persistently made efforts on how best to meet people of interest within the TRUMP Campaign. NADER told DMITRIEV that there was nothing he could do, and only came later in the context of ERIK PRINCE, in the fulfilling DMITRIEV's ongoing attempts and desire to have a contact within the TRUMP Campaign. DMITRIEV had met with Anthony SCARAMUCCI. DMITRIEV knew SCARAMUCCI before, and considered him a friend. SCARAMUCCI was a big businessman and supported TRUMP. DMITRIEV also knew Rick GERSON, who was close to JARED KUSHNER. Those were the only two Americans that DMITRIEV met with that NADER was aware of. NADER met GERSON in New York City through a contact, and met with GERSON multiple times later in the UAE. GERSON was interested in investments in the RDIF before the U.S. sanctions, but did not want to invest after the U.S. sanctions on Russia. GERSON was only in one meeting with KUSHNER, STEVE BANNON, MICHAEL FLYNN, Tony BLAIR, and MBZ. GERSON came into the meeting first and he helped arrange it. GERSON stayed throughout the meeting.

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Russia was economically hurting due to the U.S. sanctions. The Russians, if they could work their way through to the U.S., and lift the sanctions, it would help their economy. During the meeting between PRINCE and DMITRIEV, the topic of U.S. sanctions relief did not come up during their conversation. DMITRIEV was not terribly excited about meeting with PRINCE. [REDACTED]

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[REDACTED]

[REDACTED] DMITRIEV was not happy. DMITRIEV was there because NADER thought he would be instrumental in finding the right person to deal with. NADER never heard directly from BANNON that he was sending PRINCE, but PRINCE said he was designated by BANNON. NADER believed that he fulfilled DMITRIEV's request to meet someone in the Transition Team when he arranged the meeting with PRINCE.

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Pages 10-13 (November 4, 2016):

NADER was expressing his concern with DMITRIEV's health because whomever won the 2016 election would need to work to repair relations with Russia.

When DMITRIEV wrote "would be great to have a meeting with key people where you are when possible as we discussed before" refers to the necessity to have meetings with key people in the incoming administration after the election. If HILLARY CLINTON won, meetings would be set up with HUMA ABEDIN. If TRUMP won, meetings would be set up with TRUMP JR and JARED KUSHNER.

Exhibit 28 (Photos) Page 18:

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[REDACTED]

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Page 14 (November 9, 2016):

NADER said it was possible that DMITRIEV's friend who just landed in the U.S. is ANTHONY SCARAMUCCI, but he was not certain.

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[REDACTED]

NADER recollected DMITRIEV had told him that DMITRIEV could not believe that the Russians whose names have been reported in the news met with TRUMP JR in Trump Tower in June 2016. DMITRIEV told NADER that these people were nobodies in Russia.

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Page 15 (November 9, 2016):

DMITRIEV is asking NADER for to fly to New York after the election. NADER is telling DMITRIEV that he needs to check with TRUMP JR.

NADER initially did not know the "press secretary" that DMITRIEV is referring to. NADER then recalled that DMITRIEV is referring to Russian President VLADIMIR PUTIN's spokesman [REDACTED] PESKOV who was coming to New York for a chess championship. PESKOV did not ask NADER to be introduced to the TRUMP Transition Team.

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Exhibit 28 (Photos) Page 25:

This is a photo of NADER with TRUMP JR taken on November 16, 2016.

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[REDACTED]

[REDACTED]

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Page 16 (November 9, 2016):

The reference to "key person" is to MBS [MOHAMMAD BIN SALMAN].

The reference to "big country" is Saudi Arabia.

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Pages 19 to 22 (November 9-10, 2016):

These chats are discussing the upcoming chess tournament in New York. DMITRIEV is asking to be introduced to someone from the TRUMP Transition Team. NADER told DMITRIEV that he would check and develop contacts with the TRUMP Transition Team. However, NADER did not actually follow through

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 6 of 19

with this. The TRUMP Transition Team was extremely busy as the election had just occurred. DMITRIEV was persistent in his desire to meet with the TRUMP Transition Team.

DMITRIEV's text stating, "my boss sends his warmest greetings and I will see him early again next week" is a message from PUTIN. NADER did not pass this message on to the TRUMP Transition Team.

NADER did not invite anyone to the chess event. NADER did not see SCARAMUCCI or other members of the TRUMP team at the chess event.

NADER did not see TRUMP JR in Trump Tower on this trip. However, he had been planning to see TRUMP JR, as TRUMP JR had told NADER he wanted to meet.

NADER and DMITRIEV met for lunch on November 10, 2016. DMITRIEV was ecstatic about the election of TRUMP and thought it would lead to great progress towards peace in the Middle East and defeating Iran. Although DMITRIEV is Russian, he was educated in the U.S. and is pro-American. DMITRIEV said he was meeting with a lot of investors and other people, but did not specify whom he was meeting with while in the U.S.

DMITRIEV thought that TRUMP would be better than CLINTON and would lift the U.S. sanctions placed on Russia. DMITRIEV did not mention specifically when he thought the sanctions might be lifted.

DMITRIEV continued to press for a meeting with the TRUMP Transition Team. DMITRIEV said that PUTIN would appreciate it and that a meeting would make history. DMITRIEV was anxious to make these connections. DMITRIEV said he was going to work other routes to set up a meeting with the TRUMP Transition Team. NADER thinks that RICK GERSON would be DMITRIEV's likely other route to the TRUMP Transition Team.

Exhibit 28 Photos, Page 21

The Chess Dinner that occurred on November 10, 2016, in New York City did not have anyone from the TRUMP Campaign present. GERSON did not attend either. PESKOV, the press secretary for PUTIN, was at the dinner. NADER briefly meet PESKOV and shook his hand. PESKOV's English was good, he did not request anything from NADER, and stated that he worked with DMITRIEV. When shown the photo which NADER is pictured with three other individuals, NADER stated that he did not know anyone else in the photo besides DMITRIEV, and that the other two individuals were Russians. NADER did not know of a company named Fosagro, nor was he introduced to anyone from that company. DMITRIEV at the time, was still actively looking for an

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 7 of 19

[REDACTED]

introduction from NADER into the new administration. There were no talks of U.S. sanctions being lifted, and NADER only talked with DMITRIEV one on one. NADER was at the Chess Dinner for approximately 15-20 minutes, then he left. DMITRIEV left for the airport later, and departed the U.S. that same night.

NADER stayed in New York City for approximately 4-5 days. NADER saw TRUMP JR on November 15th or 16th at Trump Tower, in order to congratulate him, and did not remember any specifics from their conversation.

Exhibit 22 (WhatsApp chats between DMITRIEV and NADER), Page 37 (December 9, 2016):

NADER's reference to "working on something huge" is to a potential meeting between TRUMP and MBZ [MOHAMMED BIN ZAYED]. NADER was working with TRUMP JR to coordinate this meeting. However, KUSHNER stopped this meeting from actually happening. UAE Ambassador to the U.S, YOUSEF OTAIBA, and GERSON convinced KUSHNER that OBAMA was opposed to this meeting during the transition time. PRINCE did not know about this potential meeting between TRUMP and MBZ.

TRUMP JR told NADER that the meeting between TRUMP and MBZ was not going to happen. NADER was disappointed and confused for the reason behind this because TRUMP had met the Japanese Prime Minister and the Emir of Qatar during the transition.

OTAIBA also wanted the meeting between TRUMP and MBZ to occur after the Inauguration. OTAIBA said words to the effect, "SUSAN RICE said we shouldn't meet with the President Elect."

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[REDACTED]

[REDACTED]

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OTAIBA told NADER that RICE was informed that MBZ had arrived in New York. NADER was in New York when MBZ arrived. MBZ booked NADER a room at the Four Seasons Hotel, but NADER did not move his baggage from the Pierre Hotel to this room.

GERSON, former U.K. Prime Minister TONY BLAIR, [REDACTED]

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[REDACTED], MBZ, and [REDACTED] were at the Four Seasons Hotel when

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 8 of 19

NADER got there. Present from the TRUMP Transition Team were BANNON, KUSHNER, and MICHAEL FLYNN. GERSON was an unofficial representative from the TRUMP Transition Team. Representing UAE were OTAIBA, [REDACTED] MBZ, TAHNOUN, and [REDACTED] MBZ, [REDACTED] was also present.

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Because he was not specifically told to stay, NADER waited in an adjacent room. Other UAE staff members waited in this room. No other Americans were in the room with NADER. The meeting lasted for approximately two hours.

NADER understands that topics of fighting ISIS and Iran came up at the meeting. The meetings participants agreed that the incoming TRUMP Administration would be better than the OBAMA Administration on these topics. UAE and the incoming TRUMP Administration agreed to form a committee to go after common enemies. They exchanged each other's private phone numbers. NADER does not believe that Russia came up at this meeting. MBZ was very happy with the meeting and thought that the incoming TRUMP Administration shared the same common enemies as UAE.

At the conclusion of the meeting, NADER was invited in. MBZ introduced NADER to KUSHNER, FLYNN, and BANNON. MBZ said words to the effect "GEORGE is highly trusted, I've known him for many years, I trust him and he's like family to me." NADER mentioned to KUSHNER that they had briefly met in TRUMP JR's office, but KUSHNER did not remember meeting him.

MBZ left shortly after this. BLAIR returned and met with a [REDACTED]
[REDACTED]

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NADER flew back to UAE on MBZ's plane. NADER was instructed to keep in touch with the incoming TRUMP Administration and to specifically follow up with KUSHNER. GERSON was tasked to be NADER's connection to KUSHNER and the White House.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Page 40

The text referring to a meeting with some key people within the family and inner circle probably referred to GERSON and PRINCE. NADER might have discussed the meeting NADER had with MBZ, and possibly discussed PRINCE meeting with DMITRIEV. NADER had likely spoken of DMITRIEV to PRINCE and had discussed a meeting between the two. All along PRINCE thought in order to accomplish what they needed to do in the Middle East, tensions with Russia would have to be diffused. NADER thought PRINCE

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 9 of 19

would be uniquely qualified to do this, but no one instructed PRINCE to do it. Whatever was decided upon, PRINCE could sell to the incoming administration. PRINCE was positive on having better relations with Russia.

Exhibit 30, (Text messages between NADER and TRUMP JR), Page 18

The text to PRINCE asking for any feedback from "Steve" on their meeting refers to BANNON. The meeting itself was a quick meeting including BANNON and FLYNN in the hallway where they discussed PRINCE working on a project in Afghanistan. NADER did not remember the exact details of the conversation, but BANNON was included.

NADER explained that he sent the photo of himself and PUTIN to PRINCE due to the fact that they could not take advantage of the rare and historic opportunity in the Middle East without PUTIN. PRINCE was in agreement with this idea. They believed they had to come in from a position of strength and stand with their allies, which included Israel, Saudi Arabia, and the UAE. In regards to the Middle East and PUTIN, the U. S. sanctions were not a subject. The Gulf Countries need the U.S. and those countries need to be backed by the U.S. The U.S., the Gulf Countries, and Russia would be a marriage of convenience in order to work against their common enemies.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Page 9

The meetings referred to by DMITRIEV in his January 12, 2017 text, were meetings he wished to have as a follow up from his meetings with PRINCE. DMITRIEV was not happy with his meeting with PRINCE and wished to have a follow up with someone higher up like BANNON. NADER never followed up on DMITRIEV's request for another meeting.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Page 24

When shown the text referencing a magnificent visit, NADER stated that this referred to his meeting with DMITRIEV. NADER stated that he left New York City in a very good mood, and did not arrange any future meetings. NADER came back in December 2016 in order to decide how to proceed with the UAE and Saudi Arabia, but he never talked about Russia during those meetings.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Pages 25-26

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[REDACTED]
Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 10 of 19

When shown the text referencing "wonderful new[s] to share with you" NADER stated that this was in reference to DMITRIEV trying to work out relations with Saudi Arabia. NADER said the wonderful news was due to a recent breakthrough. DMITRIEV was designated to take a delegation from Saudi Arabia to Russia, and Saudi Arabia had just said yes. Saudi Arabia was taking it seriously and was prepared to improve relations between Russia, Saudi Arabia, and the UAE. The Saudi Arabians would not object to holding a meeting to discuss Syria and Yemen, and the Russians were becoming friendlier. The gentlemen referred to in the text was MBS.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Page 28

The text from DMITRIEV referring to a "good meeting", was referring to a meeting with MBS. The text from NADER saying "do not say another word" refers to an Arab expression, which means things are good and no need to say another word. They were currently working on Yemen and Syria, in regards to Russia.

There were no Saudi Arabian or UAE investments made with the RDIF through NADER. NADER assumed there were investments, but he was not aware of any. DMITRIEV desired to get Saudi Arabia to invest in the RDIF, but NADER was not aware of any specific investments in this period. DMITRIEV and Saudi Arabia did talk about oil.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Pages 30-31

During DMITRIEV's trip to the UAE, as referenced in the text, NADER was not present during the meeting between [REDACTED] and MBZ. The purpose of the meeting was to improve relations between Saudi Arabia and the Russians. The stunning surprise referenced was that MBZ was positive on helping MBS to make the relationship better in regards to cooperating on Yemen, Syria, etc. There was no talk about TRUMP being elected at any time. MBZ was keen on better relations between the U.S. and Russia. The UAE would be the middle man, as they were seen to be on the side of the Americans, and it would become easier to fight their common enemy. The U. S. sanctions against Russia was mentioned, as it would be good business for everyone if they were lifted. The UAE would not have the restraints that it has now and there would be more business investments in Russia. DMITRIEV was positive with Rex TILLERSON coming in as Secretary as State, as he was well known and respected in the region.

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 11 of 19

[REDACTED]

During NADER's early December 2016 trip to New York City, there was a follow up meeting with TRUMP JR, but it was not prearranged. It was typically NADER being on standby, then receiving a call to come up right at that moment.

Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Page 35

The text from DMITRIEV asking to meet the relevant people was referring to DMITRIEV being persistent on meeting someone from the incoming administration. NADER has not talked to anyone in the incoming administration about DMITRIEV up to then. It is possible that he mentioned it to PRINCE, but he did not officially mention it to anyone else. PRINCE had been to the UAE multiple times in the past, but he did not meet with MBZ. NADER met with PRINCE in November or December 2016, before the UAE /MBZ meeting. [REDACTED]

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In December 2016 NADER was called into FLYNN or BANNON's office by PRINCE. FLYNN and BANNON "vouched" for PRINCE in order to facilitate PRINCE's request to meet with MBZ.

Exhibit 30, (WhatsApp chats between NADER and TRUMP JR) Page 18 (January 3, 2017):

[REDACTED]

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[REDACTED]

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Agent Note: A break was taken.

Conference between NADER's attorneys and SCO:

NADER and his attorneys had a conference in a conference room. After the conference, NADER's attorneys returned and provided the following information emphasizing its sensitive nature.

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[REDACTED]

Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 12 of 19

[REDACTED]

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[REDACTED]

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[REDACTED]

The UAE is aware NADER has been questioned by the FBI.

NADER travelled to Mar a Lago for a TRUMP fundraiser over the past weekend.

[REDACTED]

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NADER returned to the interview and provided the following information.

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[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[Redacted]

Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 13 of 19

[Redacted]

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[REDACTED]
Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 14 of 19

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Exhibit 22, (WhatsApp chats between DMITRIEV and NADER), Pages 6-7

The text describing the friend from the first meeting who received an urgent message, was PRINCE. The urgent message is described as PRINCE having checked with friends and he wanted to relay to DMITRIEV that Libya is off the table. NADER did not know who PRINCE checked with, but it could have been with the incoming administration or it could have come from PRINCE's personal business team. NADER walked PRINCE back to meet with DMITRIEV. They meet at the same place as the first meeting, a bar area. The meeting lasted less than 10 minutes. At the second meeting between PRINCE and DMITRIEV, the only other person present was NADER. DMITRIEV relayed that Russia wanted more involvement in Libya, they were not yet inside Libya, and they would be more cooperative in other areas. PRINCE

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Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 15 of 19

[redacted]

was worried that DMITRIEV did not get his message, and therefore relayed to DMITRIEV during their second meeting that the Americans would not accept any Russian involvement in Libya. DMITRIEV wanted to know what the meeting was all about and was disappointed. DMITRIEV was expecting more from his meetings with PRINCE, such as a strategic roadmap. DMITRIEV thought they needed to speak to someone with more authority. DMITRIEV stated that [redacted]

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PRINCE and DMITRIEV did not schedule any future meetings together, or between any other parties they were involved with, and said that NADER would know how to get a hold of them. No phone numbers or cards were exchanged.

During PRINCE and DMITRIEV's first meeting, they just talked about the Middle East and anti-terrorism efforts. PRINCE talked about the history between the U.S. and Russia. PRINCE talked about how positive the incoming president is to U.S./Russia relations, but they did not mention sanctions. PRINCE spoke with confidence, knew the Transition Team, and was confident he would get their backing. According to NADER, PRINCE was interested in making money in the Middle East.

That night, after the two PRINCE and DMITRIEV meetings, NADER had dinner with DMITRIEV. [redacted]

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NADER's introductions to the TRUMP Campaign:

[redacted] and WALID PHARES were NADER's initial contacts with the TRUMP Campaign. NADER knew PHARES from years back, but they had drifted apart. NADER saw a *Washington Post* article in which TRUMP said PHARES was one of his main foreign policy advisors. NADER asked [redacted] to reconnect them.

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PHARES is well known in the Middle East as he is on the television channel Al-Arabia often. The UAE was pleased that PHARES was picked to advise the TRUMP Campaign.

NADER met PHARES at the Ritz Carlton Hotel in Tyson's Corner, Virginia. They spoke in generalities of the importance of PHARES' position as an advisor to the campaign. PHARES told NADER that [redacted] had recommended him for the position to IVANKA TRUMP and KUSHNER.

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[REDACTED]
Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 16 of 19

Otherwise, they spoke about the campaign's chances of winning and political issues. NADER found out that TRUMP and PHARES' viewpoints on Iran, Islamic extremism, and the Muslim Brotherhood were identical to the UAE's.

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[REDACTED]

After the meeting, NADER told the UAE leadership he had made contact with the TRUMP Campaign.

NADER arranged for PHARES to speak to [REDACTED] to verify his bona fides. [REDACTED] told PHARES that NADER has his total trust to connect with the TRUMP Campaign and find out TRUMP's positions. PHARES and [REDACTED] spoke on the phone for approximately 30 seconds.

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NADER put together his biography for a meeting with KUSHNER. NADER travelled to New York City with PHARES via train for this meeting. NADER paid for PHARES' first class train ticket. Five to 10 minutes prior to arriving at Penn Station, KUSHNER cancelled the meeting. PHARES was extremely upset that the meeting was cancelled. [REDACTED]

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[REDACTED] NADER then realized that PHARES did not have much influence with the campaign if he could not even get a meeting held.

NADER had planned to provide a readout of the meeting with KUSHNER to MBS, MBZ, and [REDACTED] NADER asked PHARES to reschedule the meeting, but PHARES never did.

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[REDACTED] told NADER that [REDACTED] would be another potential connection to the TRUMP Campaign. [REDACTED]

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[REDACTED]

UAE did not offer any support to the TRUMP Campaign through PHARES or anyone else.

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PHARES asked to be invited to the UAE during the campaign. MBS and MBZ thought this was a bad idea and did not allow it. PHARES visited the Formula One race held in UAE after the election.

Exhibit 31 (WhatsApp chats between PHARES and NADER) Pages 4-6, (May 9, 2016):

PHARES stated, "I am at the computer" at 12:13 AM. PHARES was writing a memo to KUSHNER about the importance of meeting NADER and to find out why their meeting had been cancelled. PHARES read a draft of the memo to NADER. PHARES told NADER that the letter would be picked up and delivered to KUSHNER.

NADER sent PHARES a picture of himself and PUTIN to ensure KUSHNER knew he was important and had influence. NADER was not planning to discuss Russia with KUSHNER, but would have mentioned that he had met PUTIN.

Exhibit 50, PHARES' memo:

NADER was shown Exhibit 50 and indicated this was the memo that PHARES had drafted.

NADER was asked questions about various parts of the memo. PHARES' principle is TRUMP. PHARES thought that Al Jazeera was too negative towards TRUMP and was hoping that NADER would influence UAE and Saudi Arabian media to put forward more positive stories.

PHARES discussed with NADER the possibility of having a conference sponsored where journalists could meet to develop more positive images of the TRUMP Campaign. The UAE has \$200 billion invested in the U.S., and MBZ could talk to his U.S. friends to support the TRUMP Campaign. This idea was discussed in principle, but NADER said that he would need a green light from KUSHNER prior to doing this.

NADER said he could provide a list of the companies and banks in which the UAE has assets to investigators at a later time.

NADER is not aware of whom in the UAE media could execute PHARES' plan. Since PHARES could not deliver a meeting with KUSHNER, he moved on but stayed friendly and in touch with PHARES.

MBZ owns or exercises significant control over Al-Arabia. MBS has similar influence over Sky News. NADER spoke with MBZ and MBS about using media they control to provide better coverage of TRUMP. MBZ and MBS wanted TRUMP to win the election. MBZ and MBS both wanted TRUMP to receive more

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[REDACTED]
Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018 , On 01/22/2018 , Page 18 of 19

positive news coverage and if he won they did not want TRUMP to be antagonized from negative news coverage from their networks.

Although PHARES never put down a specific plan on paper, NADER briefed MBZ and MBS on this media plan. For the media plan or the potential influence of U.S. companies that UAE invests in, they would need direction from the TRUMP Campaign.

NADER said that he does not remember seeing Exhibit 50 and the document PHARES showed him in New York was only one page long, not a three page document.

Exhibit 31 (WhatsApp chats between PHARES and NADER) Pages 11-12, (May 9, 2016):

NADER telling PHARES, "we are on their side" reflects telling the TRUMP Campaign that UAE is not their enemy.

NADER did not ask PHARES to be introduced to anyone else in the TRUMP Campaign. PHARES later introduced NADER to SAM CLOVIS. PHARES said CLOVIS was a "big guy" in the campaign and could introduce NADER to KUSHNER.

When they met, CLOVIS did not impress NADER. CLOVIS was primarily focused on domestic policy and NADER was concerned with foreign policy. PHARES and CLOVIS wanted to travel to the UAE. They believed that this trip would allow them the influence to get KUSHNER to meet with NADER. NADER said he would not sponsor a visit to UAE until he had actually met KUSHNER.

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[REDACTED]

Continuation of FD-302 of (U) Interview of GEORGE NADER, 1/22/2018, On 01/22/2018, Page 19 of 19

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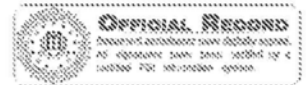
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Exhibit 19
Declaration of James A. Bowman

United States v. Alshahhi, et al., No. 1:21-cr-00371-BMC-TAM



FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/28/2018

Richard "Rick" M. GERSON, date of birth (DOB) [REDACTED] Social Security Account Number (SSAN) of [REDACTED] Address of [REDACTED] [REDACTED] was interviewed at the Special Counsel's Office, Washington, D.C. Present representing GERSON were [REDACTED] and [REDACTED] of Paul Hastings, LLP. The interviewing team were FBI Special Agents [REDACTED] and [REDACTED] FBI Intelligence Analyst [REDACTED] and Assistant Special Counsels Jeannie Rhee, Aaron Zelinsky, and Zainab Ahmad. After being advised of the identities of the interviewing agents and the nature of the interview, GERSON provided the following information:

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b5 Per DOJ/OIP

Jared KUSHNER has been a friend of GERSON's [REDACTED] b5 Per DOJ/OIP When KUSHNER became involved in the Trump campaign, their friendship continued. GERSON would occasionally bump into KUSHNER and they would talk about the campaign wherein KUSHNER would update GERSON as a friend. [REDACTED]

[REDACTED] GERSON helped setup a lunch with [REDACTED] Tony BLAIR [REDACTED]

b5 Per DOJ/OIP

[REDACTED] meeting with the UAE representatives [REDACTED]

b5 Per DOJ/OIP

Investigation on 06/05/2018 at Washington, District Of Columbia, United States (In Person)

File # [REDACTED] Date drafted 07/11/2018

by [REDACTED]

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[redacted]

(U) Interview of Rick Gerson on 06/05

Continuation of FD-302 of /2018, On 06/05/2018, Page 2 of 6

[redacted] b5 Per DOJ/OIP

[redacted] b5 Per DOJ/OIP

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[redacted] b5 Per DOJ/OIP

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[redacted] Gerson invited BLAIR to attend. The meeting [redacted]

[redacted] There were [redacted] people there from the transition team: [redacted] There were a lot of people there from the UAE side which included the UAE Ambassador. [redacted]

[redacted] b5 Per DOJ/OIP

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[REDACTED]
(U) Interview of Rick Gerson on 06/05
Continuation of FD-302 of /2018 , On 06/05/2018 , Page 3 of 6

b5 Per DOJ/OIP
b7C

GERSON was put in touch with DMITRIEV through the UAE guys. [REDACTED] b5 Per DOJ/OIP

[REDACTED]
[REDACTED] GERSON and DMITRIEV discussed investment opportunities [REDACTED]
[REDACTED]

[REDACTED] DMITRIEV wanted economic
cooperation with the United States [REDACTED]
[REDACTED]

[REDACTED] GERSON
asked KUSHNER if he heard of DMITRIEV. KUSHNER said no, and GERSON
explained that DMITRIEV headed the Russian Domestic Investment Fund
(RDIF). GERSON [REDACTED] gave KUSHNER
the list of ideas. KUSHNER [REDACTED] threw it in
a file in his desk. KUSHNER said that he would make sure the right people
got the list. [REDACTED]
[REDACTED]

[REDACTED]

(U) Interview of Rick Gerson on 06/05
Continuation of FD-302 of /2018, On 06/05/2018, Page 4 of 6

[REDACTED] b5 Per DOJ/OIP

[REDACTED] b5 Per DOJ/OIP

[REDACTED] GERSON

discussed the possibility of joint investing with RDIF. [REDACTED]

[REDACTED] b5 Per DOJ/OIP

[REDACTED] DMITRIEV asked GERSON if he knew Erik PRINCE. [REDACTED] DMITRIEV asked if PRINCE was someone important or worth spending time with. [REDACTED] b5 Per DOJ/OIP

[REDACTED] b5 Per DOJ/OIP

[Redacted]

(U) Interview of Rick Gerson on 06/05
Continuation of FD-302 of /2018, On 06/05/2018, Page 5 of 6

b5 Per DOJ/OIP

[Redacted]

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b5 Per DOJ/OIP

[Redacted]

b5 Per DOJ/OIP

[Redacted]

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[Redacted]

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b6
b7C

b5 Per DOJ/OIP

[Redacted]

[Redacted]

(U) Interview of Rick Gerson on 06/05

Continuation of FD-302 of /2018, On 06/05/2018, Page 6 of 6

[Redacted]

b5 Per DOJ/OIP

[Redacted]

b5 Per DOJ/OIP